

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PAVEL LABUSOV, an individual, and ALINA LABUSOVA,  
an individual,

Plaintiffs,

-against-

OAKES CAPITAL LLC, a foreign for-profit entity, JOAN  
GALY, an individual, ROBERT ASADULLIN, an  
individual, and WILLIAM DONALD REDFERN,  
an individual,

Defendants.

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18-cv-8162 (VSB)

STIPULATION  
EXTENDING TIME  
TO RESPOND TO  
COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties that the time within which defendants Oakes Capital LLC, Joan Galy and William Donald Redfern may move, answer, or otherwise respond to the complaint is hereby extended up to and including November 16, 2018.

No provision of this stipulation shall be construed as a waiver of, and defendants expressly reserve, all defenses.

There has been no previous request for extension of time in connection with this matter.

Dated: October 19, 2018

BACHNER & ASSOCIATES, P.C.

By: 

Michael F. Bachner

39 Broadway, Suite 1610  
New York, NY 10006

Attorneys for defendants Oakes Capital, LLC  
Joan Galy, and William Donald  
Redfern

Dated: October 19, 2018

SIROTA & ASSOCIATES, P.C.

By: 

Daniel D. Estrin

128 Brighton 11<sup>th</sup> Street, Suite 2  
Brooklyn, NY 11235

Attorneys for plaintiffs Pavel  
Labusov and Alina Labusov

SO ORDERED:

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Hon. Vernon S. Broderick  
United States District Judge